

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

No. 1:19-md-2875-RBK  
Hon. Robert Kugler

**PLAINTIFF KENNETH BERKSON'S NOTICE OF  
VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

Plaintiff, Kenneth Berkson, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, hereby gives notice of his voluntary dismissal of all of his claims asserted against all defendants in this action, without prejudice, in the above-referenced matter.

Specifically, Rule 41(a)(1)(A)(i) sets out that a plaintiff may voluntarily dismiss her claims without prejudice and without a court order by notice at any time prior to the defendants filing an answer or moving for summary judgment. Thus, Plaintiff's request is permitted as of the filing of this Notice. In light thereof, Plaintiff asserts that voluntary dismissal by notice alone is appropriate under Rule 41(a)(1)(A)(i).

Dated: December 22, 2021

Respectfully submitted,

/s/ Ruben Honik

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*/s/ Adam Slater*

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*/s/ Conlee S. Whiteley*

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***MDL Plaintiffs' Co-Lead Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of December, 2021, I caused a true and correct copy of the foregoing to be filed and served upon all counsel of record by operation of the Court's CM/ECF system.

/s/ David J. Stanoch

David J. Stanoch